

NB:SCF
F.#2012R00172

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT, E.D.N.Y.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

★ MAR 06 2012 ★

- - - - -X

LONG ISLAND OFFICE

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

NOORULLAH ZADRAN,

Defendant.

Cr. No. _____
(T. 18, U.S.C., §§
922(g)(1), 924(a)(2),
924(d) and 3551 et seq.;
T. 21, U.S.C., § 853(p);
T. 28, U.S.C., §
2461(c))

- - - - -X

THE GRAND JURY CHARGES:

CR-12 0168

COUNT ONE

(Felon in Possession of a Firearm)

HORLEY, J.

1. On or about December 31, 2011, within the Eastern District of New York, the defendant NOORULLAH ZADRAN, having previously been convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce a firearm, to wit: a Colt, .38 caliber revolver, and ammunition.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant NOORULLAH ZADRAN that upon his conviction of Count One, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), which require the forfeiture of any

firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 922(g), including but not limited to a Colt, .38 caliber revolver and ammunition recovered from the defendant on or about December 31, 2011.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value;
- or
- e. has been commingled with other property which cannot be divided without difficulty;
- it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any

other property of such defendant up to the value of the forfeitable property described in this forfeiture allegation.


(Title 18, United States Code, Section 924(d); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL


FOREPERSON

LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

By:


Assistant U.S. Attorney

No.

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

NOORULLAH ZADRAN,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 922 (g) (1), 924 (a) (2), 924(d) and 3551 et seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill
Sean C. Flynn
Foreman

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Sean C. Flynn, Assistant U.S. Attorney (631-715-7837)